

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

NO. 13-cr-20371

v.

Honorable Victoria A. Roberts

D-1 DOREEN M. HENDRICKSON,

Defendant.

_____ /

DISCOVERY NOTICE

1. The attorney for the government knows that defendant Doreen Hendrickson made:
 - a. relevant written or recorded statements, (including grand jury testimony), and/or
 - b. relevant oral statements made in response to interrogation, whether before or after arrest, by a person then known to the defendant to be a government agent, whether or not the statement is included in a written record, as follows:
 - During *United States v. Peter and Doreen Hendrickson*, civil case number 2:06-cv-11753-NGE, as reflected on the docket in that case, and in responses sent to the government on or about June 24, 2010;
 - In correspondence sent to the IRS on or about December 1, 2003, July 7, 2004, and June 2, 2011; and
 - In a letter to the undersigned on or about October 27, 2012.

2. The attorney for the government knows that defendant Doreen Hendrickson has a prior criminal record:

NO _____ YES X

3. The following books, papers, documents, photographs and tangible objects are within the possession, custody or control of the government and are intended to be used as evidence in chief at trial, are known to the government to be material to the preparation of the defense, or were obtained from or belong to the defendants:

- Documents and transcripts within the docket of *United States v. Peter and Doreen Hendrickson*, civil case number 2:06-cv-11753-NGE;
- Documents created during civil case number 2:06-cv-11753-NGE, including correspondence, interrogatories, requests for productions of documents, and responses to those documents;
- IRS records concerning Peter Hendrickson and defendant Doreen Hendrickson for tax years 2002, 2003, and 2008, including tax returns; account transcripts; Form 4340 certificates of assessments, payments, and other matters; correspondence and notices; Forms 1099 and W-2; refund checks; and Form 4549 income tax examination changes; and
- Letters from Doreen Hendrickson dated June 2, 2011 and October 27, 2012

4. Results or reports of the following physical or mental examinations, or scientific tests or experiments, are within the possession, custody or control of the government, and are either intended to be used as evidence in chief at trial or are known to the government to be material to the preparation of the defense: None at this time.
5. The government intends to introduce at trial testimony from one or more experts in the following areas of expertise: None at this time.
6. The government may introduce evidence obtained from execution of the following search warrants: Not applicable.

7. The government may introduce evidence obtained through wiretaps or other electronic surveillance:

Type: (wiretap, bug, etc.) Docket Number(s) Not Applicable X

8. The government intends to offer evidence under Rule 404(b), Fed. R. Evid.

Yes No Unsure X

9. The attorney for the government is aware of the obligations imposed by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny and will comply with their obligation to provide defense counsel with exculpatory evidence that is material to either guilt or to punishment in time for effective use at trial.

If the government discovers additional information of the type described in Paragraphs One through Eight, it will advise defense counsel in writing.

Upon specific request of the defendant Doreen Hendrickson the government will make available for inspection or copying the items described in Paragraphs One and Three; will furnish the record referred to in Paragraph Two; and will provide notice of the general nature of the evidence referred to in Paragraph Eight if the government intends to offer such evidence. The government's compliance with any specific request will trigger the defendants' duty to provide the reciprocal discovery denoted in Fed. R. Crim. P. 16(b)(1)(A)-(C). If a defendant makes a general request for discovery the government will construe it as a request for each item described in Fed. R. Crim. P. 16(a)(1) (A)-(E). The government's compliance

with the defendant's general request will trigger a defendant's duty to provide reciprocal discovery of each item specified in Fed. R. Crim. P. 16(b)(1)(A)-(C).

BARBARA L. McQUADE
UNITED STATES ATTORNEY

s/Melissa S. Siskind
s/Jeffrey B. Bender (PA-207972)
Tax Division Trial Attorneys
P.O. Box 972, Ben Franklin Station
Washington, DC 20044
Phone: 202-514-5150
E-Mail: melissa.s.siskind@usdoj.gov
E-Mail: jeffrey.b.bender@usdoj.gov

Dated: June 11, 2013

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2013, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Andrew N. Wise - Attorney for defendant Doreen Hendrickson

s/Jeffrey B. Bender
Tax Division Trial Attorney
P.O. Box 972, Ben Franklin Station
Washington, DC 20044
Phone: 202-305-4077
E-Mail: jeffrey.b.bender@usdoj.gov
Bar No. PA-207972